

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

UNITED STATES OF AMERICA,)	Case No. 1:20-cr-77
)	
Plaintiff,)	Judge Timothy S. Black
)	
v.)	DEFENDANT LARRY
)	HOUSEHOLDER’S MOTION TO
LARRY HOUSEHOLDER,)	EXTEND TIME TO FILE POST-TRIAL
)	MOTIONS
Defendant.)	

Defendant Larry Householder moves the Court, under Rule 45(b) of the Federal Rules of Criminal Procedure, to extend the time in which to file post-trial motions. Mr. Householder respectfully requests a 30-day extension of time, making any post-trial motions due April 24, 2023.

During trial, the Court denied motions for a judgment of acquittal. Pursuant to Federal Rule of Criminal Procedure 29(c), Mr. Householder intends to renew and supplement these motions and, in addition, to file a motion for a new trial pursuant to Federal Rule of Criminal Procedure 33. Unless the Court extends the time in which to file these motions, they would be due 14 days after the return of the jury’s verdict, *i.e.*, on March 23, 2023. *See* Fed. R. Crim. P. 29(c)(1), 33(b)(2).

Given the duration and complexity of the trial in this case, and the press of demands from other matters after defense counsel returned from almost two months of trial, Mr. Householder respectfully requests additional time in which to prepare his post-trial motions. This constitutes good cause under Rule 45(b) to extend the time for Mr. Householder to file post-trial motions. *See* Fed. R. Crim. P. 45(b) advisory committee’s note (“[t]he defendant may, under Rule 45, seek an extension of time to file the underlying [Rule 29 and Rule 33] motion as long as the defendant

does so within” the time limits set by the rule). Granting Mr. Householder this additional time will allow Mr. Householder and his counsel to focus his briefing on the issues most critical to these motions.

For these reasons, the Court should grant this motion and extend the time for Mr. Householder to file post-trial motions.

Dated: March 20, 2023

Respectfully submitted,

/s/ Steven L. Bradley

Steven L. Bradley (0046622)

Mark B. Marein (0008118)

MAREIN & BRADLEY

526 Superior Avenue, Suite 222

Cleveland, Ohio 44114

Phone: (216) 781-0722

Email: steve@mareinandbradley.com

mark@mareinandbradley.com

/s/ Nicholas R. Oleski

Robert T. Glickman (0059579)

Nicholas R. Oleski (0095808)

MCCARTHY, LEBIT, CRYSTAL

& LIFFMAN CO., LPA

1111 Superior Avenue East, Suite 2700

Cleveland, Ohio 44114

Phone: (216) 696-1422

Email: rtg@mccarthylebit.com

nro@mccarthylebit.com

Counsel for Defendant Larry Householder

CERTIFICATE OF SERVICE

I certify that the foregoing was electronically filed on March 20, 2023. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Steven L. Bradley

Steven L. Bradley (0046622)